



United States Environmental Protection Agency
Region 1 – New England
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Certified Mail

Returned Receipt Required (*dated as indicated on electronic signature*)

John D. Freedman, President
The Joseph Freedman Company, Inc. (MAR053576)
115 Stevens Street
Springfield, MA 01104
pb@jfreecycle.com

Re: Request for Information Pursuant to Section 308 of the Clean
Water Act (33 U.S.C. § 1318), Docket No. CWA-308-R01-FY21-41

Dear Mr. Freedman:

Facilities subject to the monitoring requirements identified in the 2015 National Pollutant Discharge Elimination System ("NPDES") general permit for stormwater discharges from industrial activity, also referred to as the 2015 Industrial Stormwater Multi-Sector General Permit ("MSGP"), are required to submit their sampling results to EPA electronically using EPA's NetDMR system no later than 30 days after receiving their complete laboratory results. Facilities which do not have a discharge or who are unable to obtain a sample during the monitoring period must similarly use NetDMR to submit their Discharge Monitoring Reports ("DMRs") with the appropriate "no data indicator" or "NODI" code to EPA no later than 30 days after the end of the reporting period.

It appears that your facility has not submitted all DMRs that were due under the MSGP. EPA has sent several Notice of Non-Receipt emails to The Joseph Freedman Company, Inc. to notify it of the overdue DMRs and has received no response. The Joseph Freedman Company, Inc. is hereby required, pursuant to Section 308(a) of the Federal Clean Water Act (the "Act"), 33 U.S.C. 1318(a), to respond to this Request for Information (the "Request") within **the time frames indicated in this letter**.

1. **Within fourteen (14) days of receipt of this Request**, The Joseph Freedman Company, Inc. must complete and submit all missing DMRs required under the MSGP. DMRs must be submitted to EPA using NetDMR for all relevant monitoring periods for which the facility received coverage under the MSGP. NetDMR must also be used to report any failure to monitor during the regular reporting period using one of the available "no data indicator" or "NODI" codes (see Attachment #1). When weather conditions prevent the collection of samples according to the relevant monitoring schedule, the facility must take a substitute sample during a subsequent

qualifying storm event and submit the new information as a corrected DMR through NetDMR.

2. Facilities shall send an email to R1.NetDMR@epa.gov to notify EPA when all of the missing DMRs have been submitted and include with this email an explanation of why the original sample was not collected and reported in a timely manner.

Facilities may contact R1.NetDMR@epa.gov if they need help establishing an account in NetDMR or submitting their DMRs through NetDMR. Thank you for your assistance and timely response to this Request. If you have questions regarding this Request, please contact Diane Castricone of my staff at 617-918-1762.

Sincerely,

James Chow, Deputy Director
Enforcement and Compliance Assurance Division

Enclosure/EPA No Data Indicator Codes

e-cc:

Diane Castricone, CWA Compliance Data Coordinator
R1 ICIS Coordinator
File

NetDMR – No Data Indicator (NODI) Coding Guide

Updated (NODI) Codes (12/17/20)

<u>Name</u>	<u>Description</u>
2	Operation Shutdown
3	Special Report Attached
7	No Influent
9	Conditional Monitoring - Not Required This Period
A	General Permit Exemption
B	Below Detection Limit/No Detection
C	No Discharge
E	Failed to Sample/Required Analysis Not Conducted
F	Insufficient Flow for Sampling
I	Land Applied
N	Not Constructed
P	Laboratory Error or Invalid Test*
Q	Not Quantifiable
T	Environmental Conditions – Monitoring Not Possible*
W	Dry Lysimeter/Well

*Newly Added NODI Code
